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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

GABRIELLE GANGITANO,

Plaintiff,

v.

CABRILLO COLLEGE, and ALEX B.
TAURKE,

Defendants.

Case No. 5:17-cv-02870-LHK

**STIPULATION AND [PROPOSED] ORDER TO
CONTINUE MEDIATION DEADLINE**

Hon. Lucy H. Koh

STIPULATION

Plaintiff GABRIELLE GANGITANO and Defendants CABRILLO COLLEGE and ALEX B. TAURKE by and through counsel of record for the DISTRICT, hereby represent to the Court as follows:

1. By Order dated August 23, 2017, the parties were ordered to complete private mediation by November 30, 2017.

2. The parties respectfully request that the deadline to complete mediation be extended to December 8, 2017 and to file their joint case management statement (or a notice of settlement) by December 11, 2017 for the December 13, 2017 case management conference.

3. The parties have been diligently conducting discovery. The depositions of defendant Alex Taurke and Cabrillo College occurred respectively on October 9, 2017 and October 12, 2017. Written discovery is proceedings. Plaintiff, a college student, is scheduled to be deposed on November 10, 2017.

4. The parties have agreed to attend private mediation with John Bates, Jr., Esq. on December 8, 2017.

5. For all the good cause stated above, the parties respectfully request this Court continue the deadline to complete private mediation from November 30, 2017 to December 8, 2018 and to file their joint case management statement (or a notice of settlement) by December 11, 2017 for the December 13, 2017 case management conference

6. The parties respectfully request that the Court approve this stipulation and incorporate its terms in an Order.

It is so stipulated and agreed.

Dated: October 23, 2017

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

By: /s/ Nicole Phillips
Eugene B. Elliot
Ethan M. Lowry
Nicole L. Phillips
Attorneys for Defendant
CABRILLO COMMUNITY COLLEGE DISTRICT

1 Dated: October 23, 2017

DAVIS & YOUNG, APLC

2
3 By: /s/ Mark Davis

Mark E. Davis

4 Adam J. Davis

Attorneys for Defendant

5 ALEX TAURKE

6 Dated: October 23, 2017

KRISTENSEN WEISBERG, LLP

7
8 By: /s/ John Kristensen

John P. Kristensen

9 David L. Weisberg

Christina M. Le

10 Attorneys for Plaintiff

11 GABRIELLE GANGITANO

12 **ATTORNEY ATTESTATION**

13 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
14 conformed signature (“/s/”) within this E-filed document or have been authorized by plaintiff’s counsel
15 to show their signature on this document as /s/.

16 Dated: October 23, 2017

By: /s/ Nicole Phillips

17 Nicole L. Phillips

18
19 **[PROPOSED] ORDER**

20 GOOD CAUSE APPEARING THEREFORE, and the parties’ having stipulated to the same, the
21 parties’ stipulation is hereby APPROVED. The deadline to complete mediation currently set for
22 November 30, 2017 is continued to December 8, 2017 and the deadline to file a joint case management
23 statement is continued to December 11, 2017

24 **IT IS SO ORDERED.**

25
26 Dated: _____

Lucy H. Koh

UNITED STATES DISTRICT COURT JUDGE